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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DANIEL DELGADO,
Plaintiff,

v.

DHARM-JIT HOLDING COMPANY, LLC;
STANDARD FOOD SERVICE, LLC dba
DENNY'S,

Defendants.

Case No. CV 11-2037

**JOINT STIPULATION OF TIME
EXTENDING TIME FOR DATES
STATED IN SCHEDULING ORDER
FILED APRIL 25, 2011;
ORDER**

Complaint Filed: 4/25/2011

Trial Date: None set

Plaintiff DANIEL DELGADO and Defendants DHARM-JIT HOLDING COMPANY, LLC and STANDARD FOOD SERVICE, LLC dba DENNY'S (collectively "Defendants") hereby jointly stipulate, through their attorneys of record, to a forty-five (45) day extension of time of the deadline by which the Parties must hold a joint site inspection of the premises, and all ensuing or dependent dates, as set forth in the "Scheduling Order for Cases Asserting Denial of Right of Access Under Americans With Disabilities Act Title II & III (42 U.S.C. 12131-89)" ("Scheduling Order"), filed April 25, 2011. With the 45-day extension, the deadline for the site inspection shall be extended from August 3, 2011 to September 19, 2011; the deadline for completion of initial disclosures shall be extended from July 27, 2011 to September 12, 2011; the last date by which the Parties shall meet and confer to discuss settlement shall be extended from August 17, 2011 to October 3, 2011; etc.

The Parties' stipulation is based on the following:

(1) All Parties though their counsel have jointly agreed to extend by forty-five days the date for the joint site inspection, the date for initial disclosures, the date for meet and confer discussions, and all other dependent or ensuing dates set forth in the Scheduling Order, based on: (a) the long-scheduled, pre-planned unavailability (vacation) of defense counsel from June 17 – July 5, 2011; and (b) the unavailability of Plaintiff's counsel from July 7, 2011 through August 3, 2011;

(2) In light of the foregoing and the Parties' stipulation above, the Parties agree good cause exists to extend these dates in the Scheduling Order, subject to the mutual availability of counsel and their experts; and

(3) No prior enlargement or extension of time to the Scheduling Order has been sought.

IT IS SO STIPULATED.

Dated: June 15, 2011

MOORE LAW FIRM, P.C.

/s/ Tanya E. Moore

Tanya E. Moore
Attorneys for Plaintiff
DANIEL DELGADO

1 Dated: June 15, 2011

JACKSON LEWIS LLP

2
3 /s/ Cara Ching-Senaha

4 Jamerson C. Allen

Cara Ching-Senaha

5 Attorneys for Defendants

DHARM-JIT HOLDING COMPANY, LLC and

STANDARD FOOD SERVICE, LLC dba DENNY'S

6
7 **ORDER**

8 Having considered the Parties' Stipulation and the grounds stated therein, and for good
9 cause shown, the Court hereby extends the dates set forth in the Scheduling Order by forty-five
10 (45) days, as follows:

11 The deadline for the site inspection shall now be September 19, 2011;

12 The deadline for completion of initial disclosures shall be September 12, 2011;

13 The last date by which the Parties shall meet and confer to discuss settlement shall be
14 October 3, 2011.

15 IT IS SO ORDERED.

16
17 Date: June 17, 2011



18 Paul S. Grewal

19 United States Magistrate Judge

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21 4836-6150-6825, v. 1